



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:BCR
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 15, 2019

By ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Judge Cogan:

Pursuant to the Court's orders of January 22, 2019 (Dkt. No. 557) and March 20, 2019, the parties are due to provide a joint proposal to the Court today regarding the unsealing of sealed and redacted docket entries filed prior to October 1, 2018.¹

The parties have been diligently reviewing previously-sealed filings in an effort to determine which may be properly unsealed and made available to the public. However, the parties' review remains ongoing, and the parties respectfully request a modest extension to May 3, 2019 to complete this review and submit a joint proposal for unsealing to the Court.

¹ The parties have previously filed proposals for unsealing and/or redaction of sealed docket entries filed after October 1, 2018. See Dkt. Nos. 568, 587, 600.

This extension will permit the parties to devote appropriate resources and full consideration to the effort to review previously-sealed filings.

Respectfully submitted,

COUNSEL FOR DEFENDANT
A. Eduardo Balarezo, Esq.
Jeffrey Lichtman, Esq.
William Purpura, Esq.

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

ARTHUR G. WYATT, CHIEF
Narcotic and Dangerous Drug Section
Criminal Division,
U.S. Department of Justice

OF COUNSEL:
ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY
Southern District of Florida

cc: Clerk of the Court (BMC) (by ECF)